

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GLADYS JONES	:	CIVIL ACTION
1734 North Wilton Street	:	
Philadelphia, PA 19131	:	
	:	
v.	:	
	:	NO.
BLUESTEM BRANDS, INC. d/b/a	:	
FINGERHUT	:	
6509 Flying Cloud Road	:	
Eden Prairie, MN 55344	:	
	:	
and	:	
	:	
NATIONAL SPORTING GOODS CORP.	:	
376 Hollywood Avenue	:	
Suite 20	:	
Fairfield, NJ 07004	:	

NOTICE OF REMOVAL

To the United States District Court
For the Eastern District of Pennsylvania:

AND NOW comes defendant, National Sporting Goods Corporation, for the purpose of removing this cause to the United States District Court for the Eastern District of Pennsylvania and respectfully states as follows:

1. This is an action pending in the Court of Common Pleas for Philadelphia County and docketed at February Term 2015, No. 0607.
2. Said action was instituted in the Court of Common Pleas by filing a complaint on February 4, 2015 with the Office of the Prothonotary. Plaintiff seeks money damages from

defendants. A copy of plaintiff's complaint filed in the Court of Common Pleas is appended hereto as Exhibit "A".

3. Defendant, Bluestem Brands, Inc., is a citizen of the State of Delaware and is incorporated under the laws of that state and maintains a principal place of business in Eden Prairie, Minnesota.

4. Defendant, National Sporting Goods Corp., is a citizen of the State of New Jersey and is incorporated under the laws of that State and maintains a principal place of business in Fairfield, New Jersey.

5. Defendants, Bluestem Brands, Inc. and National Sporting Goods Corp., were served by certified mail on February 13, 2015. Copies of the docket entries of the Court of Common Pleas are appended hereto as Exhibit "B".

6. Plaintiff's complaint seeks damages "in excess of One Hundred and Fifty Thousand Dollars", although in a manner contrary to the Pennsylvania Rules of Civil Procedure. *See*, Pa.R.C.P. 1021(b).

7. This is a suit of a civil nature and involves a controversy among citizens of different states. Plaintiff alleges she is a citizen and resident of Pennsylvania while defendant Bluestem Brands is a citizen of Delaware and National Sporting Goods is a citizen of New Jersey.

8. Copies of all process, pleadings and orders which have been received by defendants are filed herewith.

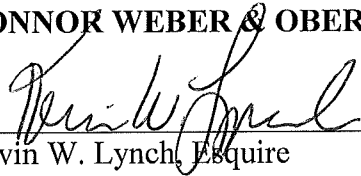
9. Defendant, Bluestem Brands, Inc., has consented to the removal of this action to the United States District Court.

10. This Notice is timely, filed within thirty (30) days of the receipt by the defendants of a copy of the complaint setting forth the claims for relief upon which the action is based.

WHEREFORE, defendants pray that this action be removed from the Court of Common Pleas of the First Judicial District of Pennsylvania (Philadelphia County) to the United States District Court for the Eastern District of Pennsylvania.

Respectfully:

CONNOR WEBER & OBERLIES

 *KWL4904*

Kevin W. Lynch, Esquire
2401 Pennsylvania Avenue
Suite 1C47
Philadelphia, PA 19130
(215) 978-2913
Email: klynch@cwolaw.com
Attorneys for defendant,
National Sporting Goods Corp.

Date: March 11, 2015

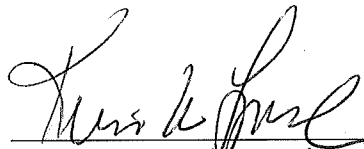
CERTIFICATE OF SERVICE

I, Kevin W. Lynch, Esquire, certify that on March 11, 2015, a true and correct copy of this Notice of Removal on behalf of defendant, National Sporting Goods Corp., was served upon counsel by electronic filing and United States first class mail, postage prepaid at the following addresses:

Richard M. Jurewicz, Esquire
Galfand Berger
1835 Market Street
Suite 2710
Philadelphia, PA 19103

Rita Anne O'Keefe, Esquire
Senior Counsel
Bluestem Brands, Inc.
6509 Flying Cloud Road
Eden Prairie, MN 55344

CONNOR WEBER & OBERLIES

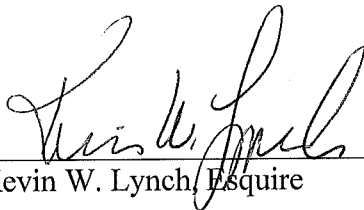


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Suite 1C47
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(215) 978-2913
Email: klynch@cwolaw.com
Attorneys for defendant,
National Sporting Goods Corp.

Date: March 11, 2015

COMMONWEALTH OF PENNSYLVANIA :
 :
COUNTY OF PHILADELPHIA : SS.

KEVIN W. LYNCH, ESQUIRE, being of full age, deposes and says that he is the attorney for defendant, National Sporting Goods Corp., herein; that he is authorized to take this verification on its behalf; that he has read the foregoing Notice of Removal by him described; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Kevin W. Lynch, Esquire

CONNOR, WEBER & OBERLIES

By: Kevin W. Lynch, Esquire
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Attorneys for defendant,
National Sporting Goods Corp.

GLADYS JONES

v.

BLUESTEM BRANDS, INC. d/b/a
FINGERHUT and NATIONAL
SPORTING GOODS CORP.

: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
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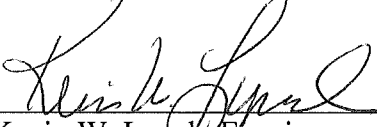
: February Term, 2015
: No. 0607
:

TO: The Prothonotary of the Court of Common Pleas
of Philadelphia County

Pursuant to 28 U.S.C. §1446(e), defendant files herewith a certified copy of the Notice of Removal filed in the United States District Court for the Eastern District of Pennsylvania on the 11th day of March, 2015.

CONNOR WEBER & OBERLIES

Date: March 11, 2015



Kevin W. Lynch, Esquire
Attorneys for defendant,
National Sporting Goods Corp.

Opposing Counsel:

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